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Attorneys for Defendants,  
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SIEGEL

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

SUZANNE D. JACKSON,

Plaintiff,

v.

WILLIAM FISCHER; JON SABES;  
STEVEN SABES; DAVID GOLDSTEEN;  
MARVIN SIEGEL; BRIAN CAMPION;  
LONNIE BROOKBINDER; CHETAN  
NARSUDE; MANI KOOLASURIYA;  
JOSHUA ROSEN; UPPER ORBIT, LLC;  
SPECIGEN, INC.; PEER DREAMS INC.;  
NOTEBOOKZ INC.; ILEONARDO.COM  
INC.; NEW MOON LLC; MONVIA LLC;  
and SAZANI BEACH HOTEL,

Defendants.

Case No. 3:11-cv-02753-JSC

**STIPULATION AND [PROPOSED]  
ORDER EXTENDING TIME TO  
RESPOND TO COMPLAINT;  
DECLARATION OF TANYA HERRERA  
IN SUPPORT**

1 Plaintiff Suzanne Jackson and defendants Marvin Siegel, Jon Sabes and Steven  
 2 Sabes, (together "Defendants"), by and through their counsel, and subject to the Court's approval,  
 3 stipulate as follows:

4 WHEREAS, plaintiff served her complaint on Dr. Siegel on August 19, 2011;

5 WHEREAS, plaintiff served her complaint on Jon Sabes and Steven Sabes on  
 6 August 30, 2011;

7 WHEREAS, Defendants have requested an extension of time to answer or  
 8 otherwise respond to the complaint;

9 WHEREAS, plaintiff has agreed to extend Defendants' time to answer or  
 10 otherwise respond to the complaint to October 11, 2011;

11 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED BY AND  
 12 BETWEEN THE PARTIES that, subject to the Court's approval, Defendants shall answer or  
 13 otherwise respond to the complaint on or before October 11, 2011.

14 Dated: September 8, 2011

SHEPPARD MULLIN RICHTER  
 & HAMPTON LLP

15 By: /s/ Robert J. Stumpf, Jr.

16 Robert J. Stumpf, Jr.  
 17 Attorneys for Plaintiff  
 18 SUZANNE D. JACKSON

19 Dated: September 8, 2011

STEIN & LUBIN LLP

20 By: /s/ Tanya Herrera

21 Tanya Herrera  
 22 Attorneys for Defendants  
 23 MARVIN SIEGEL, JON SABES and STEVEN  
 24 SABES

25 PURSUANT TO STIPULATION, IT IS SO ORDERED

26 Dated: \_\_\_\_\_

27 \_\_\_\_\_

**DECLARATION OF TANYA HERRERA**

I, Tanya Herrera, declare as follows:

1. I am Of Counsel at Stein & Lubin LLP, counsel for defendants Marvin Siegel, Jon Sabes and Steven Sabes ("Defendants") in this action. I have personal knowledge that the facts set forth in this declaration are true and correct and, if called as a witness, could and would testify thereto.

2. As set forth in the attached stipulation, the parties have agreed to extend Defendants' time to answer or otherwise respond to Plaintiff's complaint to October 11, 2011. Defendants intend to file a motion to dismiss pursuant to Federal Rule of Civil Procedure 12(b)(6) and will seek a mutually convenient hearing date as soon as the case is reassigned to a district court judge.

3. The reason for the requested extension is to give Defendants' counsel, who have only recently been retained, time to come up to speed in the facts of this case. There have been no previous time modifications in this action.

4. The requested extension of time should not have any significant impact on the schedule for the case, given that the case is currently unassigned and Defendants will seek a mutually convenient hearing date as soon as the case is reassigned to a district court judge.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 8th day of September 2011 at San Francisco, California.

/s/ Tanya Herrera  
Tanya Herrera